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Presentment Date: December 3, 2015 at 12:00 PM
Objection Date: November 30, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

PARTIES LISTED ON APPENDIX A ATTACHED
TO THE ACCOMPANYING NOTICE OF
PRESENTMENT,

Defendants.

Adv. Pro. Nos. listed on Appendix A
Attached to the accompanying
Proposed Order

**DECLARATION OF JULIE GORCHKOVA IN SUPPORT OF APPLICATION
FOR AN ORDER TO WITHDRAW AS COUNSEL**

I, Julie Gorchkova, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746,
as follows:

1. I am an associate with Becker & Poliakoff LLP (“B&P”).
2. I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing B&P to withdraw as attorneys of record in connection with the proceedings listed on Appendix and be deemed removed as counsel of record in connection with those proceedings; (2) ordering that certain B&P email addresses be removed from any and all mailing matrixes, service lists and Notices of Electronic Filing in connection with those proceedings as well as the related main liquidation proceedings (Adv. Pro. No. 08-01789); and (3) granting such other and further relief as the Court deems just and proper.
3. Unless otherwise stated, the foregoing is based on my personal knowledge.
4. Helen Davis Chaitman, lead counsel to the parties listed on Appendix A (the “Parties”), has moved her practice from B&P to Chaitman LLP.
5. None of the Parties have expressed a desire to continue to be represented by B&P.
6. Ms. Chaitman, who has filed notices of appearance reflecting her new contact information, remains attorney of record for the Parties, and will continue to represent them.
7. Although the electronic Court dockets for all but three of the proceedings listed on Appendix A¹ list only Chaitman LLP, not B&P or any of its attorneys, as attorneys of record, B&P is filing this application at the Trustee’s insistence and out of an abundance of caution so that there is an Order confirming that B&P is removed as counsel in the proceedings listed on Appendix A.

¹ Electronic Court docket for Adv. Pro. Nos. 10-04885, 10-05133, and 10-05206 also reflect me or Peter W. Smith, a former shareholder of B&P. Those cases were inadvertently omitted from the Application to Withdraw as Counsel B&P filed on or about November 6, 2015 (Adv. Pro. No. 08-01789, ECF No. 11997).

Dated: November 24, 2015
New York, New York

/s/ Julie Gorchkova